

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Ashley R. Brown	:	Chapter 7
	:	Case No.: 20-11265-ELF
Debtor(s)	:	

**MOTION TO REOPEN CASE FOR THE LIMITED PURPOSE
OF AMENDING SCHEDULES “B” & “C”**

Debtor, Ashley R. Brown, by and through the undersigned counsel, hereby moves this Honorable Court to reopen the above-captioned Chapter 7 Bankruptcy for the limited purpose of amending Schedules “B” and “C”:

1. The above captioned bankruptcy matter was filed as a Chapter 7 matter on February 28, 2020.
2. On June 26, 2020, an Order was entered discharging the Chapter 7 case.
3. Prior to the filing of the Chapter 7 matter the debtor entered into litigation for a settlement lawsuit regarding a medical device.
4. The settlement lawsuit was filed on March 3, 2019 in the Arizona United States District Court, captioned as Brown v. CR Bard Incorporated, et al.
5. Debtor did not notify her counsel in this Honorable Court of the ongoing lawsuit and as a result of the same, the matter was not included on the original Bankruptcy filings in Schedule “B,” “C,” or the Statement of Financial Affairs.
6. Upon notice of the lawsuit and its settlement outside of court, Debtor’s counsel notified the Chapter 7 trustee regarding the same.
7. The settlement will yield \$15,132.89 per the Settled Statement attached hereto as Exhibit “A.”
8. Debtor is seeking to reopen her Bankruptcy matter to make the necessary amendments to Schedules “B” and “C” so that the Standing Chapter 7

trustee may make a determination as to the extent the debtor's purported exemptions will be applied towards the settlement proceeds.

WHEREFORE, Debtor, Ashley R. Brown, by and through the undersigned counsel, respectfully requests this honorable court to enter an Order reopening the instant Chapter 7 Bankruptcy matter for the limited purpose of amending schedules "B," "C," Statement of Financial Affairs and such additional or alternative relief as may be just and proper.

Dated: June 9, 2022

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107